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March 24, 2023

Via Electronic Filing

The Honorable Judge Ramon E. Reyes, Jr
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Cruz v. Erblin Corp. et al*
Case No.: 1:23-cv-02002-KAM-RER

Dear Honorable Judge Reyes,

This law firm represents Defendants Erblin Corp., Arben Miftarallari, and Erblin Miftarallari (collectively, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 2(B) and 2(C), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including April 24, 2023.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 7-8] and requires additional time to gather information from Defendants to respond to the Complaint. It is further stipulated and agreed that Defendants waive any defense to personal jurisdiction due to improper service of process.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
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VIA ECF: All Counsel

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendants to waive any defenses to personal jurisdiction due to improper service of process.